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6 *Attorneys for Plaintiff*

7
8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 LYNN THOMPSON,

10 Plaintiff,

11 vs.

12 TESLA MOTORS, INC.; ONQGLOBAL,
13 INC.; DOES 1-50,

14 Defendants.
15

CASE NO.: 3:21-cv-00238-HDM-CSD

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO FILE
HIS REPLY IN SUPPORT OF MOTION
FOR LEAVE TO FILE FIRST AMENDED
COMPLAINT**

(FIRST REQUEST)

16
17 Plaintiff LYNN THOMPSON (“Plaintiff”), and Defendants TESLA MOTORS, INC.
18 (“Tesla”) and ONQGLOBAL, INC. (“OnQ”), by and through their respective attorneys of
19 record, hereby submit that Plaintiff shall have an extension of time up to and including Monday,
20 January 23, 2023, in which to file a reply in support of Plaintiff’s Motion for Leave to File First
21 Amended Complaint. [ECF 78]. This Stipulation is submitted and based upon the following:

- 22 1. On December 5, 2022, Plaintiff filed his Motion for Leave to File First Amended
23 Complaint (“Motion”). [ECF 78].
24 2. On January 5, 2023, Defendants filed their respective responses along with
25 supporting papers to Plaintiff’s Motion. [ECF 81-85].
26 3. Plaintiff’s reply brief in support of his Motion is currently due January 12, 2023.

27
28 **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO FILE HIS REPLY IN
SUPPORT OF MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT (FIRST REQUEST)**

1 4. Unfortunately, Plaintiff's counsel has an on-going family emergency that is limiting
2 her ability to prepare the reply brief. Plaintiff's counsel requests additional time to
3 consult with Plaintiff and to prepare the brief.

4 5. As such, the parties have agreed to continue the due date for Plaintiff's reply brief
5 to Monday, January 23, 2023.

6 6. This is the first request to extend the deadline for Plaintiff's reply brief in support
7 of his Motion [ECF 78] and is not made for purposes of undue delay.

8 Dated: January 9, 2023.

9 **HKM EMPLOYMENT ATTORNEYS, LLP JACKSON LEWIS P.C.**

10 /s/ JENNY L. FOLEY

11 **JENNY L. FOLEY, Ph.D., ESQ.**

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Attorneys for Defendant Tesla Motors, Inc.

18 **FENNEMORE CRAIG, P.C.**

19 /s/ SHANNON S. PIERCE

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Attorneys for Defendant OnQGlobal, Inc.

**STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO FILE HIS REPLY IN
SUPPORT OF MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT (FIRST REQUEST)**

ORDER

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE
CASE NO.: 3:21-cv-00238-HDM-CSD

DATED: January 9, 2023

**STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO FILE HIS REPLY IN
SUPPORT OF MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT (FIRST REQUEST)**

EXHIBIT 1

Damas, Gabriela

From: Pierce, Shannon <SPierce@fennemorelaw.com>
Sent: Monday, January 9, 2023 9:58 AM
To: Hoyt, Kyle J. (Las Vegas); Arata, Mike; Foley, Jenny
Cc: Damas, Gabriela; 36f4c7597+matter1414394927@maildrop.clio.com; Sliker, Joshua A. (Las Vegas); Beavers, Wade
Subject: RE: Thompson v. Tesla Motors Inc., et al. -- Reply Briefs re: Motion for Leave

Same here.

Shannon S. Pierce, she/her
Director

FENNEMORE.

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From: Hoyt, Kyle J. (Las Vegas) <Kyle.Hoyt@jacksonlewis.com>
Sent: Monday, January 9, 2023 9:57 AM
To: Arata, Mike <marata@hkm.com>; Pierce, Shannon <SPierce@fennemorelaw.com>; Foley, Jenny <JFoley@hkm.com>
Cc: Damas, Gabriela <gdamas@hkm.com>; 36f4c7597+matter1414394927@maildrop.clio.com; Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>; Beavers, Wade <WBeavers@fennemorelaw.com>
Subject: RE: Thompson v. Tesla Motors Inc., et al. -- Reply Briefs re: Motion for Leave

Thanks Mike – this looks good to me and can be submitted with my signature.



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Attorney at Law

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From: Arata, Mike <marata@hkm.com>
Sent: Monday, January 9, 2023 9:44 AM
To: Hoyt, Kyle J. (Las Vegas) <Kyle.Hoyt@jacksonlewis.com>; Pierce, Shannon <SPierce@fennemorelaw.com>; Foley, Jenny <JFoley@hkm.com>
Cc: Damas, Gabriela <gdamas@hkm.com>; 36f4c7597+matter1414394927@maildrop.clio.com; Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>; Beavers, Wade <WBeavers@fennemorelaw.com>
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[EXTERNAL SENDER]

Hi Shannon and Kyle:

Here is the proposed stipulation extending the reply brief due date for your review and approval.

Please let me know if you have any edits or if we can submit the stipulation with your electronic signatures.

Thanks again,
Mike



Mike Arata
Attorney

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From: Arata, Mike
Sent: Monday, January 9, 2023 9:18 AM
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Cc: Damas, Gabriela <gdamas@hkm.com>; 36f4c7597+matter1414394927@maildrop.clio.com; Pierce, Shannon <SPierce@fennemorelaw.com>; Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>
Subject: RE: Thompson v. Tesla Motors Inc., et al. -- Reply Briefs re: Motion for Leave

Thank you, Shannon and Kyle. Your courtesy is greatly appreciated. We will prepare the stipulation.



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From: Hoyt, Kyle J. (Las Vegas) <Kyle.Hoyt@jacksonlewis.com>
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Cc: Damas, Gabriela <gdamas@hkm.com>; 36f4c7597+matter1414394927@maildrop.clio.com; Pierce, Shannon <SPierce@fennemorelaw.com>; Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>
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Yes an extension to the 23rd is fine.



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Sent: Monday, January 9, 2023 9:13 AM
To: Hoyt, Kyle J. (Las Vegas) <Kyle.Hoyt@jacksonlewis.com>; Beavers, Wade <WBeavers@fennemorelaw.com>; Foley, Jenny <JFoley@hkm.com>
Cc: Damas, Gabriela <gdamas@hkm.com>; 36f4c7597+matter1414394927@maildrop.clio.com; Pierce, Shannon <SPierce@fennemorelaw.com>; Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>
Subject: Thompson v. Tesla Motors Inc., et al. -- Reply Briefs re: Motion for Leave

[EXTERNAL SENDER]

Hi Wade and Kyle:

We've received your clients' respective responses to Plaintiff's Motion for Leave to File First Amended Complaint.

The replies are currently due January 12, 2023. Are your clients willing to stipulate to extend the due date to January 23, 2023? If so, we can prepare the stipulation.

Please let me know if you would like to discuss this further, (702) 674-9270.

Thanks,
Mike



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Attorney

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